



Air Transport Association

David A. Berg, Esq.  
202-626-4234  
dberg@airlines.org

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U.S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street, SW  
Room Plaza 401  
Washington, DC 20590

Re: Docket No. FAA-2002-13918  
Proposed Revisions to Passenger Facility Charge Rule

Dear Sir or Madam:

In their joint submission dated February 12, 2003, the Airports Council International-North America and the American Association of Airport Executives assert that airlines do not incur "any" credit card charges for refunded tickets, and then argue that, consequently, reimbursing airlines on the collected basis (versus remitted) basis is not justified.

This argument is irrelevant both to the question of whether airline reimbursements should be calculated on a PFC-collected basis, and whether the information collected by the FAA justifies the proposed increase. This is so because the credit card charge information collected by the FAA already takes this point into account – it is net credit card charge data. Consequently, whether a charge is incurred for refunded tickets is irrelevant to the question of whether the decision to compute the reimbursement on a collected basis.

Please include this comment in this docket.

Very truly yours,

David A. Berg  
Assistant General Counsel